

P₄ Production, LLC

Soda Springs Plant
1853 Highway 34
P.O. Box 816
Soda Springs, Idaho 83276-0816
Phone: (208) 547-4300
Fax: (208) 547-3312

December 20, 2016

VIA CERTIFIED MAIL: 7015 3430 0000 0568 6505
RETURN RECEIPT REQUESTED

Lynn Van Every
Water Quality Manager
Idaho Department of Environmental Quality
444 Hospital Way, #300
Pocatello, ID 83201

RE: REQUEST TO AMEND BEAR RIVER TMDL

Dear Mr. Van Every:

P4 Production, L.L.C. (“P4”) hereby requests that the Idaho Department of Environmental Quality (“IDEQ”) amend the *Bear River/Malad River Subbasin Assessment and Total Maximum Daily Load Plan* (rev’d Feb. 2013) (the “TMDL”). As you know, P4’s Soda Springs plant (the “Plant”) discharges non-contact cooling water, which is authorized under NPDES Permit No. ID-000119-8, to a segment of Soda Creek just north of the City of Soda Springs. While the original TMDL (adopted in 2006) noted P4’s discharge as an existing point source, said discharge was characterized as simply a thermal discharge; a phosphorus wasteload allocation (“WLA”) was not derived for P4’s discharge. Although the 2011 and 2013 amendments to the TMDL included the Bear River - Ovid Creek confluence to Alexander Reservoir (Assessment Unit ID16010201BR002_06), these revisions did not provide an allocation for P4’s discharge to Soda Creek.

P4 requests the TMDL be amended to include a phosphorus WLA for P4’s discharge to Soda Creek. P4 is supplying with this letter, phosphorus sampling data for its discharge as well as monitoring data for Soda Creek and spring sites in the vicinity of P4’s outfall. Although additional evaluations are ongoing, phosphorus in the discharge appears to be passing through the cooling water system from the Plant’s water supply wells.

The phosphorus WLA TMDL is of keen interest to P4 because US EPA Region 10 ("EPA") is currently processing P4's renewal application for the aforementioned NPDES permit. Without a WLA for phosphorus, there is uncertainty as to how EPA will derive a discharge limit, if any, for phosphorus in the renewed permit. As a result, P4 requests that IDEQ communicate with David Brick, the EPA NPDES Unit permit writer working on P4's renewal permit, and other EPA Office of Water and Watersheds staff, as appropriate, to coordinate schedules for the TMDL amendment and NPDES permit issuance. P4 would be glad to be involved in and facilitate these discussions if desired.

If you have questions about this request, please contact Jason Maughan at (208) 547-1239. P4 appreciates your kind consideration and stands ready to assist with the TMDL amendment process and setting an appropriate phosphorus allocation for P4's discharge to Soda Creek.

Sincerely,

Mike L. Veile
Optimization Lead

In behalf of:

Roger W. Gibson
Vice President, Operations

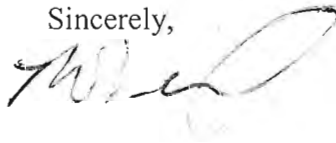
Enclosure: Technical Memorandum, Total Phosphorus Analytical Data

CC: David Brick - EPA (email)
Susan Poulosom - EPA (email)
Kathryn Cerise - EPA (email)
Denise Faulk - EPA (email)
Bill Lawrence - IDEQ (email)
Doug Tanner - IDEQ (email)
Mary Anne Nelson - IDEQ (email)

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